

**Bluegrass Cellular, Inc.
P.O. Box 5012
Elizabethtown, Kentucky 42702-5012**

**E911 Location Accuracy Progress Report
47 C.F.R. § 20.18(i)(4)(ii)
PS Docket No. 07-114**

Bluegrass Cellular, Inc. is meeting compliance deadlines prescribed by the Federal Communications Commission in *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (released Fed. 3, 2015) (*Fourth Report and Order*), and codified in 47 CFR § 20.18(i), *et seq.*

Bluegrass Cellular works diligently and covers costs necessary to provide public safety with accurate location data for emergency callers. Over the past twelve months, Bluegrass Cellular has timely performed its *Fourth Report and Order* location accuracy obligations and has submitted reporting and compliance documentation to the FCC by the following deadlines:

February 1, 2018

A Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114, providing aggregate live 911 call data for reporting period July through December 2017, for Bluegrass Cellular's CDMA network (internally hosted) and VoLTE network (externally hosted by Verizon Wireless' LTE in Rural America program). As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(3)(ii)(E), Bluegrass Cellular's 911 live call data is collected and reported based on the largest county in its service area footprint. The report was sent to the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials (APCO) and the National Association of State 911 Administrators (NASNA).

April 3, 2018

In accordance with 47 CFR § 20.18(i)(2)(i)(B)(1), Bluegrass Cellular had begun to provide dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls.

June 4, 2018

As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(2)(iii), Bluegrass Cellular submitted to the FCC certification that as of April 3, 2018, it did not provide service or report live call data in one or more of the Test Cities, was providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently

with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the two-year benchmark set forth at 47 CFR § 20.18(i)(2)(i)(B)(2).

August 1, 2018

A Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114 on or before August 1, 2018, providing aggregate live 911 call data for reporting period January through June 2018, for Bluegrass Cellular's CDMA and VoLTE networks, and the report was sent to NENA, APCO and NASNA.

August 3, 2018

Bluegrass Cellular makes available to PSAPs uncompensated barometric data for any 911 call placed from any handset that has the capability to deliver barometric sensor data, in compliance with 47 C.F.R. § 20.18(i)(2)(ii)(A).

Bluegrass Cellular has adopted procedures that comply with FCC indoor accuracy requirements:

Bluegrass Cellular retains for two years all testing and live call data gathered for Non-Nationwide Carrier Live 911 Call Reports, pursuant to 47 C.F.R. § 20.18(i)(3)(iii).

Bluegrass Cellular delivers x- and y-axis (latitude, longitude) confidence and uncertainty (C/U) data for all wireless 911 calls - whether placed from indoors or outdoors - at the request of a Public Safety Answering Point (PSAP), on a per-call basis, with a uniform confidence level of 90 percent, per 47 CFR § 20.18(j).

Bluegrass Cellular collects and retains for two years information on all wireless 911 calls placed on its network, including the positioning source method used to provide a location fix associated with the call. The data is made available to PSAPs upon request in accordance with 47 CFR § 20.18(k).

Bluegrass Cellular will continue to meet location accuracy requirements of 47 CFR § 20.18, utilizing the expertise of highly qualified providers of E911 technology services.

TeleCommunication Systems, Inc. / Comtech Telecommunications (Comtech) provides Bluegrass Cellular a wireless E911 solution using the efficient, open architecture of the Xypoint® Location Platform (XLP) and traditional landline networks to delivery public safety services. Comtech integrates with PSAPs, ALI (automatic location information) databases and local exchange carriers. Comtech's location service team provides Bluegrass Cellular with end-to-end support, switch integration, database management, geographic information services (GIS), compliance expertise, services to PSAPs and cost-recovery assistance.

As the number of subscribers or 911 transactions increase, Bluegrass Cellular and Comtech can add capacity and migrate XLP location services to next generation technology. Comtech facilitates advanced capabilities such as interfacing with the Evolved Serving Mobile Location Center (ESMLC) and, as it evolves, the National Emergency Address Database (NEAD).

Comtech's E911 solutions integrate with Bluegrass Cellular's small cells and with new developments such as device-based hybrid location services that calculate location based on integrated sensor data. Another new advantage is that if a 911 caller's device can provide WiFi access point information, Comtech can integrate with a crowd source database to derive the caller's location. Comtech also will be able to provide location information from Android devices using Google Advanced Mobile Location, which passes location information via Short Message Service (SMS) to a Google back-end where the caller's location is derived and delivered to 911 answering points.

Bluegrass Cellular and Comtech will continue to incorporate technological advancements to enhance the safety of emergency callers by delivering accurate and useful location information to emergency dispatch personnel, in keeping with FCC requirements and timelines.

A handwritten signature in dark ink, appearing to read "Doug Updegraff", is written over a horizontal line.

Doug Updegraff
Vice President & Chief Technical Officer

Date: July 31, 2018